

North American Numbering Council
Meeting Minutes
February 18, 1998

I. Time, Date and Place of Meeting: The North American Numbering Council held a meeting, commencing at 8:30 a.m., at the Federal Communications Commission, 1919 Street, NW, Room 856, Washington, DC.

II. List of Attendees:

| A. Council Members | | |
|-----------------------|---------------------|-------------------------------------|
| <u>Voting Members</u> | | <u>Organization</u> |
| 1. | Cronan O'Connell | ALTS |
| 2. | Colette Capretz | American Mobile Satellite |
| 3. | Woody Kerkeslager | AT&T |
| 4. | Dan Hochvert | Bell Atlantic |
| 5. | Dennis Hinkel | Cincinnati Bell |
| 6. | Ronald Binz | Competition Policy Institute |
| 7. | Carol Anne Bischoff | Compel |
| 8. | Brian Fontes | CTIA |
| 9. | Alan Hasselwander | Frontier |
| 10. | Bernard Harris | GTE |
| 11. | Peter Guggina | MCI |
| 12. | Gerry P. Thompson | Mobility Canada |
| 13. | Vincent Majkowski | NARUC |
| 14. | Bridget Szczech | NARUC |
| 15. | Beth O'Donnell | NCTA |
| 16. | Christine Walker | NEXTLINK Communications |
| 17. | Lawrence R. Krevor | Nextel Communications |
| 18. | Ray Strassburger | Northern Telecom |
| 19. | Trent Boaldin | OPASTCO |
| 20. | Mark Golden | PCIA |
| 21. | Mike Bennett | SBC Communications |
| 22. | Rikke Davis | Sprint Corp. |
| 23. | Diane Little | Sprint Spectrum PCS |
| 24. | Edmund Gould | Teleport Communications Group (TCG) |
| 25. | Dan Bart | TIA |
| 26. | Paul Hart | USTA |

Special Members (non-voting):

Susan Miller ATIS
Ron Conners NANPA

B. Commission Employees

Marian Gordon, Designated Federal Official
Geraldine Matise, Chief, Network Services Division (NSD), CCB
Gayle Teicher, NSD, CCB
Erin Duffy, NSD, CCB
Andre Rausch, NSD, CCB
Patrick Forster, NSD, CCB
Jeannie Grimes, NSD, CCB

III. Estimated Public Attendance: Approximately 31 members of the public attended the meeting as observers.

IV. Documents Introduced. Each member received the following handouts:

- (1) Agenda
- (2) CICs Ad Hoc Group Report and Recommendation
- (3) Report on NANC CICs Ad Hoc Group Process
- (4) Cost Recovery Working Group - NECA Board Nominations
- (5) NECA North American Numbering Plan Funding [package sent to carriers]
- (6) NANPA Working Group Status Report
- (7) Aging of Disconnect Numbers
- (8) SMS/800 Memorandum of 2/16/98, Re: Costs of SMS/800 Services
- (9) NANPA Transition Plan - Central Office Code Administration and NPA Relief Planning
- (10) LNPA Working Group Status Report and Presentation on High Volume Call-in Networks
- (11) Wireline/Wireless Integration Task Force Report
- (12) Number Pooling Management Group (NPMG) Report

V. Summary of the Meeting:

A. Welcoming Remarks. Alan Hasselwander, Chairman of the Council, provided welcoming remarks.

B. CIC Ad Hoc Group Report & Recommendation. Co-Chairs, Paul Hart, USTA, and Peter Guggina, MCI, provided the report to the Council. The CICs report was e-mailed to Council members before the meeting. Highlights and recommendations from the report were provided on a handout. Peter and Paul complimented the CICs Ad Hoc group participants as an excellent group with institutional memory on CICs. The Ad Hoc Group's recommendations are as follows:

Commission's rules: Do not codify entire guidelines, but consider codifying rule requiring activation within six months of assignment, and requirement for semi-annual usage and access reports. These two items are triggers to identify CICs that are not being used. The rules should maintain the basic tenet of the CIC Assignment Guidelines which provide the

greatest latitude in the provision of telecommunication services and maintain effective management of a finite resource.

Entity definition: An entity is a firm or group of firms under common ownership and control. Control is defined as one firm having a 50 percent or greater ownership interest in another.

Conservation: Discontinue present two CIC per entity limit at the end of 10XXX dialing. Establish six CIC per entity limit with evaluation at six months for possible increase of limit. In the group's view, a shortage is unlikely with a 10,000 code resource, and the group estimates a 22-year life cycle of the CIC resource. Therefore, the group concluded that extraordinary measures are unnecessary, and recommends implementation of a conservation plan within five years of exhaust.

General areas: The group recommended elimination of the Feature Group D trunk purchase requirement and the special use category. It recommended that CIC sharing be permitted but not required. It is the group's position that merger CICs should not count towards the limit and that the INC reclamation procedures should be retained.

According to Paul and Peter, the recommendation represents industry consensus reached through cooperative discussion and problem solving. The minority opinions of GTE and BellSouth concerning merger codes are listed at Appendix B to the report. The CICs Ad Hoc Group requested NANC approval of the report which is due to the FCC no later than February 19, 1998.

Discussion: Trent Boaldin, OPASTCO, stated his opposition to codifying any guideline, fearing that codification will effect competition and services to end users. Peter commented that the Ad Hoc Group considered this issue, but determined that the guidelines needed some "teeth," and, as a compromise, limited guideline codification to these two narrow concerns. The group agreed that it is quicker for the industry to change guidelines rather than undergoing a regulatory proceeding to change codified rules. Paul Hart added that there were NANPA representatives present during these discussions who agreed that codification of these two pieces would help remove questions about the authority to handle those situations. The NANPA comments were a factor in the group's decision and unanimous agreement to include a codification recommendation in the two narrow areas.

Dan Hochvert, Bell Atlantic, commented that some CICs are used internally and are never dialed by the public and asked whether the Ad Hoc Group considered these in their discussion. Peter stated that it did and that intra-network CICs were discussed. The group recommended that an additional activity be undertaken within the industry to study the differences between intra-network CICs and pseudo-CICs, but recommended retaining the current range of CICs that are used as intra-network CICs without disturbing that current industry practice. There are 200 CICs in the 9,000 range (9000-9199). Paul Hart commented that the 9000 series would not be issued until the end, and then the issue can be used to protect codes and permit them to continue to be used as intra-network without having any assignments that will cause a member of the public to dial the code. See page 8, ¶¶15 and 16 of the Report,

which states that the CIC Assignment Guidelines have set aside a block of 200 CICs, the 9000-9199 range for intra-network usage.

Dan Hochvert stated that distinguishing public CICs from internal CICs might be useful if CICs that are available to entities and are publicly available to dial are being unnecessarily limited. Chairman Hasselwander stated that currently the intra-network CICs comprise only about 206 out of the pool of 10,000, but noted that, in the future, Dan's point might be something for NANC to consider. Dan suggested that the industry might consider using another space for internal codes, and that the likelihood of exhausting the current 10,000 CICs would lessen substantially. Paul Hart commented that the group recommends a review after six months, and that the group at that time could further examine the questions surrounding intra-network codes, if the Commission agrees to that and if NANC recommends it. The CICs comments are due March 6, and reply comments by April 3, 1998.

Mike Bennett commented that the industry may file comments on both the CICs FNPRM and the NANC recommendation, and complimented the Ad Hoc Group on its ability to achieve consensus on these issues and produce a timely report. In response to Trent Boaldin's concerns, Woody Kerkeslager stated that some national regulations are necessary to achieve competitive markets, and that for the NANC to take a position that no regulation is appropriate is wrong. Chairman Hasselwander referred to the CICs report, page 4, ¶4, stating that “. . . the Commission should not adopt the CIC Assignment Guidelines as formal rules, except for the existing requirements that CICs actually be activated and used by the assigned carrier.” Chairman Hasselwander stated that it was quite clear that the recommendation for codification is limited to those areas where the group thought that NANPA needed additional enforceability.

Dan Hochvert questioned whether it was the Group's intention to identify the maximum number of CICs an entity could have and not lose some in a merger. Peter Guggina used the following example: If an entity, Company A, has five CICs and acquires two more in a merger with Company B, those two would not count against the merged entity. Company A can get one more CIC. Company B goes away and cannot get any more CICs. Peter read a contribution from Bell Atlantic which proposed the following text: “The only CICs that are to be counted toward the maximum number of CICs, are the number of CICs that are/were assigned to the parent or surviving entity before any of their respective mergers or acquisitions took place.” Bernie Harris stated that the language in paragraph 28 is sufficient as is and was not necessarily improved by the Bell Atlantic clarification. Woody Kerkeslager asked whether there must only be one surviving entity, and how the proposition applies to mergers of equals? Paul Hart stated that the group did consider this issue, but did not want to address every possible scenario, so it wrote the definition of entity very tightly. The Ad Hoc group recognized that there could be situations where a merger and some surviving entities might still be qualified depending upon how those specific mergers were done.

Bernie Harris, GTE, recommended submitting the Ad Hoc Group work product to the Commission and letting entities submit their comments directly to the Commission. Chairman Hasselwander asked Council members if they were clear on the meaning of ¶¶ 27 and 28. Woody Kerkeslager, AT&T, moved to recommend approval of the report and submission to the Commission. It was agreed that the report would be sent forward to the Commission without

further modification. The Council reached consensus on the Report, with one opposition noted. The Report will be forwarded by letter to the Chief, Common Carrier Bureau.

CICs Ad Hoc Process. Paul Hart discussed the Ad Hoc experience and stated that some unusual circumstances made this timely outcome possible. See Handout #3. The Co-chairs laid out a work plan based on the Commission's tentative conclusions in the FNPRM, and obtained an agreement among the participants for abbreviated due process. A high level record of the meetings and mechanism up-front for noting and recording dissenting views was established; the meetings were conducted rapidly and with urgency, and everyone had an opportunity to be heard. The group established a schedule and maintained it. The process was highly contribution driven and participants were very familiar with the topic and issues, working well with one another so conclusions were reached quickly. Views among participants were less divergent than originally thought. Paul stated that the Ad Hoc process, to the degree possible, should be emulated for the new N11 Ad Hoc Group.

C. Cost Recovery Working Group Report. Chairman Hasselwander stated that he met with the Chief of the Common Carrier Bureau on January 21, 1998. At that meeting, Chairman Hasselwander agreed that NECA should be the B&C Agent for NANPA, subject to certain conditions. Chairman Hasselwander stated that the agreement was due in large part to concern about the delay of payment Lockheed Martin. Chairman Hasselwander stated that the NANC had sent a strong message regarding what is expected of NECA. He stated that, if there are future problems involving billing and collection, the NANC will have the opportunity to cure those problems in an orderly manner that it (NANC) can control.

NANPA Cost Recovery Working Group Co-Chairs, Anne LeLena, WorldCom, and John Banuleos, PacBell, provided the report to the Council. John stated that the Co-Chairs have been working with both NECA and Lockheed Martin trying to figure out which one would be the B&C Agent. The object now is to be sure NECA is able to pay Lockheed on time. John stated that two public notices were released. NECA now has OMB approval for the form used to collect payments and the factor for calculating the amount due. The second public notice addressed a waiver petition filed by NECA for a 90-day period to perform the B&C Agent functions until the subsidiary is formed. NECA also requested a modification as to the nature of how the Board will meet, suggesting one face-to-face meeting, and three conference calls.

NECA representatives Robert Haga and John Ricker provided an update on the OMB form and process for collection, and discussed the actions taking place regarding the formation of the Board. Over 3,500 copies of the form were distributed February 12-13 to those carriers located in the Carrier Locator Directory. The form is a half page document requiring three pieces of information. Carriers are required to: (1) submit 1996 gross revenues and payments to other carriers; (2) subtract payments to other carriers from gross revenues to come up with net revenues; and (3) multiply by a factor .000022 to come up with their annual payment for support of the NANPA. The minimum contribution amount is \$100.00. Carriers whose annual payment is over \$1200.00 are allowed to send monthly payments of 1/12 of their annual requirement. The document is to be signed and certified by an officer of the corporation and sent with the first month's payment to the NBANC lockbox, in care of Mellon Bank, Pittsburgh, PA, for deposit. The form includes an eight page instruction sheet explaining the revenues that are allowed as

deductions and revenues that get included as part of the gross revenue amount. In addition to sending the form to all carriers on the Carrier Locator Directory, NECA also sent the form to the national associations with a separate cover letter asking their assistance in sending the form out and informing their members.

Dan Hochvert, Bell Atlantic, requested that NECA provide the NANC members with a copy of the package sent to the carriers, noting that it would help facilitate coordination within each of the NANC member companies. Chairman Hasselwander stated that Robert Haga has provided a copy of the list containing the top two hundred companies. Additionally, NECA has established a help line (listed on the form) for parties to call for assistance in completing the form. Paul Hart requested a list of the ILEC contact points to which the national association letters were sent, so that associations could better assist their members. USTA is concerned that small and mid-size operating companies may be unaware of this requirement. Woody Kerkeslager, AT&T, requested a copy of the list of contacts for AT&T. Woody requested estimates of the billing for budgeting purposes and asked NECA whether they have estimates for the total billing for each entity. John Ricker, stated they did not have those estimates because NECA does not have data on the payments to other carriers. Woody asked for clarification on an earlier understanding that NECA would exclude international revenues in calculating contributions. Anne LaLena stated that foreign revenue would not be included, only intra-state, inter-state and international traffic from the United States and return traffic. Traffic from AT&T operations in Europe or Asia would be considered foreign traffic and that is excluded.

Robert Haga stated that every NANC member will receive a copy of the package and a list of names. The list of nominations for the subsidiary was provided. Robert stated that the first Board meeting will be held on March 25, 1998, for election of the Board, some financial resolutions, and an update on the status of the funds. The Board will meet quarterly to oversee the fund. In addition, NECA will keep the Cost Recovery Working Group and the NANC informed of the activities of the corporation and the funds flow. Bernie Harris asked for clarification of the terms agreed to in the correspondence between the Commission and the NANC Chairman. Chairman Hasselwander stated that the agreement is that the original fixed price is in place, and in addition to that, NECA can receive, incrementally, for the expenses including the audit and incorporation costs, not more than \$25,000 per year. Vincent Majkowski, NARUC, in further response read Paragraph 2 of the January 25, 1998 NECA letter to Chief, CCB, into the record:

NECA will perform the B&C function for its original fixed, bid price, adjusted for the increased audit requirement imposed by the Commission's October 9, 1997 Order in CC-Docket No. 92-237 (Order). These extra costs amount to \$22,000 in year two and \$24,000 in year four of NECA's five year term. In addition, the subsidiary corporation will recover the actual costs incurred in complying with the independent subsidiary structure required by the Order. This additional cost recovery will not exceed \$25,000 in any of the five years conditional upon agreement that conference call meetings are consistent with the Order as described below.

Chairman Hasselwander noted that the 2/10/98 letter from the Chief of the Common Carrier Bureau to NANC also captures those same positions. John Banuelos advised that,

pursuant to the public notice and the memorandum, NECA will report to the Commission and the NANC on a monthly basis on the progress of the billing process and the Board's selection and formation.

Dan Bart asked about the process by which monies will be invoiced and collected for non-U.S. entities that participate in NANPA. John Banuleos responded that Lockheed Martin is looking to set this up. An earlier NANPA presentation to the NANC broke down functions being used by the international partners. Lockheed is working to establish the dollar amount and establish a single point of contact for each international member. Lockheed will inform NECA of the single point of contact and the dollar amount agreed to, and the billing process will take place. The negotiations between the parties will be the most critical aspect of this process.

John Banuelos reported that Lockheed has been concerned about getting paid and sent a letter to Chief of the Common Carrier Bureau. The Cost Recovery Working Group discussed this with NECA, and they have been assured that payment will take place on time and that NECA will secure a line of credit to handle any shortfalls. Lockheed is still concerned about the fluid nature of this situation and has made a proposal for a more formal contractual arrangement. John stated that the Working Group is considering the possibility and will report out on this issue at the next meeting. Chairman Hasselwander stated that the Cost Recovery Working Group has agreed to continue to be the eyes and ears of NANC on cost recovery to eliminate future surprises. Chairman Hasselwander believes things are moving forward and that he feels comfortable that NECA is prepared to do the job appropriately. Joe Franlin, Vice President of Operations, Lockheed Martin, thanked the Chairman and the Cost Recovery Group for their intercession in this matter and added that Lockheed is satisfied with the outcome and the process that has been put in place for the possible shortfall payment. Chairman Hasselwander read the NANP Billing and Collection Agent Board of Director nominations into the record. (*See Handout # 4*).

D. Southeast, West and West Coast LLC Status Update. A joint report was presented by Pamela Connell, President, Southeast Number Portability Region, LLC; Richard Scheer, Chair, West Coast Portability Services, LLC, and Tommy Thompson, Chair, Western Region Telephone Number Portability, LLC (via conference bridge).

Pamela Connell reviewed the key events of the past 18 months. In late 1996 and early 1997, the three LLCs separately selected Perot Systems as their local number portability administrator (LNPA) to provide NPAC SMS services. By May 1997, each LLC executed master contracts with Perot requiring delivery of the NPAC/SMS by October 1, 1997. Service providers proceeded with testing last summer, and it became apparent that Perot and its subcontractor, Nortel, had not provided a stable hardware/software platform and would not meet the October 1, 1997 NPAC delivery date. Consequently, during September and October the LLCs collectively negotiated an amended master contract with Perot and Nortel. The new contract included a revamped testing schedule, substantial penalties for missed milestones, expanded termination rights for the LLCs, and a new performance date of December 15, 1997. Pamela stated that this was crucial for many service providers to make plans for commercial LNP availability by March 31, 1998, for the Phase I MSAs. Concerns over the software stability and delivery continued throughout turn up testing in November and early December.

Pamela reported that, by December, it was clear that dates would be missed. Quality improvement plans pushed the anticipated performance dates further into 1998. In addition to day-to-day testing activities of the service providers, the LLCs engaged in some significant management and oversight activities. In November, the LLCs arranged to pay for a comprehensive audit of Perot and Nortel management of the NPAC project. The LLCs met with Perot and Nortel on January 8, 1998 to discuss the audit and proposed delivery plans. On January 15-16, 1998, the LLCs conducted a system architecture review of the Perot/Nortel NPAC architecture. The assessment of the both the audit and the system architecture review was not encouraging. Throughout this period, service providers continued to test the NPAC software and problem reports continued to mount. Pamela stated that the Perot/Nortel plan discussed on January 8 called for six additional software loads (A through F) through July 6, 1998. However, load A, which was to fix only 16 of the many open problem reports, did poorly in product validation testing. Specifically, Perot/Nortel reported a pass rate of only 72% versus the 87% pass rate they had projected. It was suggested that loads A and B could be combined, but clearly the situation was not improving.

Richard described the subsequent activities. Since September, the three LLCs have been working closely with their members (incumbents and new entrants alike) to make implementation happen. Richard mentioned the joint LLC filing to the Commission on January 23, 1998, requesting a change of the waiver request date for the Phase I MSAs in the three regions. Richard praised the swift action of NANC, the Commission, and industry members on moving the waiver request date, and stated that the unanimous support for moving the waiver request date was a rare and welcome event. Richard stated that the affected LLCs considered another vendor and jointly wrote to Lockheed Martin to develop and propose a high level plan to facilitate the transition of users in their regions to the Lockheed NPAC SMS. On January 20, the LLCs met in Dallas to hear the assessment of Perot Systems architecture review that had been conducted on January 15-16. The LLCs met again with Perot's executive team, including Ross Perot, who was committed to doing all he could to expedite the NPAC delivery. The LLCs also met with Lockheed to discuss its response to the joint LLC request. The LLCs on January 29 attended a meeting in Chicago, at the Lockheed NPAC, and on February 4 attended a cross-regional meeting of project executives and the user community. On February 5 the negotiating team evaluated the Lockheed architecture and pricing and then presented positions on identified issues to Lockheed at a meeting in San Antonio. On February 6 the negotiating team and Lockheed reached agreement in principle on all identified issues. On February 10, the LLCs notified Perot of termination of the master contract. The LLCs executed master contracts with Lockheed on February 13, 1998.

New dates in the three regions will be proposed to the Commission on March 3, after a joint meeting to be held on February 23, 1998, to determine the precise impact to the MSA implementation schedule. This information will be made available to each company. LLC non-members may obtain the information from state regional operation teams. The LLCs want to recognize John Bavis, the Perot Systems LNPA Account Director, and thank his team for their support.

Mike Bennett, SBC, stated that SBC and PacBell will file a waiver request concerning live testing, having discovered some incompatibility between the software of interconnecting

carriers, vendor software and some services that SBC offers. SBC will not be able to correct this and have it fully tested in time for the Phase I deadline. This will impact Houston and Los Angeles. Chairman Hasselwander asked whether there were technical questions or issues in the SBC territory that would be instructive in other regions. Mike deferred the question to Gary Fleming, who stated that SBC's analysis had been primarily internal, and that he did not know if the problems would extend to other regions. The problems involve the ability to do LIDB queries, alternate billing service validation, and selective call gapping functions that directly impact network reliability. Chairman Hasselwander asked how difficult the solutions for these problems are. Gary replied that the solutions are complex and that he could not predict how long they would take. Peter Guggina, MCI asked when the problems were discovered. Gary stated he believed that it had been within the previous two weeks, and that the problems were not encountered during SBC's extensive internal testing prior to that time.

Chairman Hasselwander proposed that the NANC formally notify the Commission by letter that the waiver petitions would be forthcoming on issues previously communicated to the Commission (*i.e.*, the NPAC vendor change from Perot to Lockheed by three LLCs). Woody Kerkeslager stated that NANC should endorse the outcome and compliment the process. Paul Hart questioned whether NANC was supposed to ratify the selections, stating that it would be appropriate to send letter to the Bureau confirming that the LLC report has been made to the NANC and that NANC is aware of and concurs in what is going on. The Council affirmed the selection of the LLCs and will convey this to the Bureau by letter.

E. LNPA Working Group Status Report. Bonnie Baca, Co-Chair, Technical and Operational Requirements Task Force, presented the report to the Council. The handouts included: (1) an action plan for items following up on the Commission's instructions in the *Second Report and Order*, FCC 97-289, CC Docket No. 95-116; (2) a NPAC system and center readiness revised schedule, and (3) a presentation on high volume call-in networks.

Regarding high volume call-in networks, Bonnie reported that the LNPA Working Group had reached consensus to recommend a solution to issues regarding incorporation of HVCI networks into the LNP scheme. The Working Group chose a non-LRN based solution contributed by SBC, subject to certain conditions. (*See Handout #10 for additional details.*) It was agreed that the LNPA Working Group would provide a report at the next NANC meeting regarding how to notify the industry of how to incorporate HVCI networks in the LNP scheme.

Bonnie also reported that the LNPA Working Group had scheduled a meeting to start developing process flows for number pooling.

Wireline/Wireless Integration Task Force Update. Lori Messing, Co-chair of the WWITF, provided the report and two handouts to the Council. Three key questions were referred to the NANC by the WWITF concerning the "rate center disparity issue:" (1) Whether the difference in scope of porting capabilities between wireless and wireline service providers creates a competitive disadvantage which would be inconsistent with the Commission's objectives for numbering; (2) if so, whether this competitive disadvantage is overridden by the Commission's order to implement wireless - wireline portability to encourage CMRS - wireline competition; and (3) whether the inability in certain situations for a wireless end user, staying at

the same location, to keep his telephone number when changing to a wireline service provider, would be acceptable from a statutory or regulatory perspective.

Chairman Hasselwander stated that he questions whether NANC needs to consider these questions at all and whether it is the NANC's role to consider such questions. He stated that the Commission asked the NANC to report on standards and procedures necessary to provide for CMRS provider participation in local number portability, but did not request the NANC to look at the policy or neutrality implications. Chairman Hasselwander stated that the NANC could report to the Commission on the facts and note the existence of the disparity. Chairman Hasselwander stated that he believes the NANC process could be gamed and used to slow down LNP. Peter Guggina recommended that NANC not act on the questions, but rather leave it to individual companies to assert their positions. He noted that it is unlikely that NANC would reach a solid consensus on this issue.

Paul Hart, USTA, concurred and questioned what value a NANC debate on the rate center disparity issue would add to the process. Woody Kerkeslager, AT&T, stated that NANC should take the information from the WWITF and identify the disparity issue to the Commission and indicate how to remove the disparity. Woody stated that this would provide sufficient NANC guidance for the LNPA Working Group and the WWITF to do requirements and continue making progress. Woody stated that the Commission could advise the NANC if proceeding this way is inconsistent with the Commission's public policy objectives. Chairman Hasselwander stated that the letter would state that NANC will proceed to write standards and procedures, understanding that there is this disparity, and will clearly identify to the Commission the result, so that if this action will not yield the result the Commission wants from a public policy perspective, the Commission can act on it. Vincent Majkowski added that this issue has been discussed at the last three NANC meetings and concurred with providing written notice to the Commission. He stated that there should be a decision from the Commission on the disparity issue. The Council agreed that the WWITF should move forward, and that NANC would send a letter to the Commission indicating that the work for the May 18 report on wireless integration into LNP is proceeding and that the rate center disparity issue exists. Chairman Hasselwander would also send a letter to the WWITF formally instructing the group to proceed with developing standards and procedures for wireless integration into LNP.

F. Number Pooling Management Group (NPMG) Status Report. Cathy Handley, INC Co-Moderator, provided the report to the Council. On March 16, the INC will meet in Annapolis. She stated that the LNPA Working Group T&O Task Force has started to work on the number pooling document. A NPMG conference call was tentatively scheduled for March 18, 12 - 1 p.m. EST, in preparation for the NANC meeting the following week.

Mike Bennett, SBC, questioned the status of the items listed in the NPMG's last report as beyond the scope of the NPMG Group, and whether there had been action by the NANC to refer those issues to the right entity. Mike stated that the state commissions frequently ask when number pooling will happen, and stated that it would help if pooling issues would get assigned to appropriate fora, and if NANC could get feedback from these fora. Cathy stated that Jim Lord from T1S1 attends the INC meetings and is aware of what is going on with pooling. Jo Gallagher, INC Co-Moderator, stated that INC has received a liaison from T1S1.6 regarding

work on LNP requirements. She stated that the INC report on number pooling was forwarded to T1S1.6, but that INC did not specifically ask T1S1.6 to undertake any work for number pooling. Jo stated that there are SCP requirements for efficient data representation that need to be done for 1000s block pooling. There are also end-office switch requirements and an issue regarding cost code 26 if a service provider chooses to pre-port their numbers in the LNP data bases, she said. Jo stated that all of these issues have to be worked out for 1000s block pooling, and no one has accepted responsibility to do that work at this point.

Bernie Harris commented that the current charter of T1S1.6 addresses work exclusively on the LNP requirements, and that T1S1.6 does not have authority to work on number pooling at this time. Mike Bennett commented that SCP vendors state that it could take a year to develop the requirements, 18 months to build those requirements, additional time for deployment. He questioned how anyone can think that number pooling can be implemented by the end of this year. Dan Bart stated that there are at least three different groups within TIA that are doing work relevant to LNP. He is not aware of any number pooling activity currently going on at TIA. Dan commented that these processes are contribution driven and that companies have to dedicate resources to develop standards.

Christine Walker, NEXTLINK, stated that, before LNP issues got to T1 committees, the requirements were developed at the state level in Illinois and New York. She stated that carriers compelled their vendors to participate there, and that even carriers outside of those states, such as US West and BellSouth, participated in those forums because they knew the work was valuable. Christine stated that there are active initiatives on pooling in both Illinois and New York, and added that companies, by broadening participation in those states, and by encouraging their members to participate, can perhaps get a lot of this work done for T1S1.6. Bernie Harris, GTE, asserted that the state model served its purpose on the development of LNP standards, but that he would encourage his vendors to go to a recognized standards body with open participation to catch those requirements not caught in the Illinois document and not make the same "mistakes," such as leaving out wireless. Bernie stated that companies should encourage their manufacturers to go these forums and develop these requirements as soon as possible. He stated that he supports NANC sending a letter Gerry Peterson of Committee T1 requesting that pooling work be added to the charter for T1S1.6, but stated that the NANC needs to be as specific as possible about the requirements.

Paul Hart stated that there needs to be a joint technical subcommittee with expertise from the wireline and wireless communities, and that a letter to Committee T1 is not broad enough. Larry Krevor, Nextel, stated that wireless carriers are participating in the number pooling trial in Illinois, subject to the recognition that wireless carriers cannot actually implement pooling for some time. Larry stated that there has to be one national approach for number pooling, but that it is difficult to determine where to work to develop that approach should occur. Dan Hochvert commented that suppliers that will profit from number pooling are likely suppliers to provide the impetus for requirements for number pooling. Susan Miller, ATIS, stated that NANC needs to define its needs as specifically as possible and write a letter to George Edwards of ATIS. She suggested that the target architecture might not come out of T1 but rather the NIIF and one of its architecture committees, and that other pieces might have a home in the different ATIS forums. She stated that NANC should send a letter to

George Edwards for consideration, but should remember that the forums need support, resources, and contributions or the work will not move.

Chairman Hasselwander requested that NPMG provide specific recommendations and a proposal at the next NANC meeting for the best way to proceed. He noted that there is clear consensus that these issues need to be addressed.

F. Lockheed Martin - NANPA Update. Ron Conners provided the Report and two handouts to the Council. The NANPA transition plan had 90 days to transfer control from Bellcore to Lockheed. The two stage transfer began with the employment of Nancy Fears and Jim Deak on November 10, 1997. On January 19, 1998, the NANPA facility was moved to Washington, D.C. Notice was supplied by a press release and a planning letter, and a forwarding message on the Bellcore telephone number. A new web page went up with more information than the previous Bellcore NANPA web page. This was monitored by the NANPA Transition Task Force, chaired by Jo Gallagher and Bob Hirsch. They conducted a random survey which indicated that the transition, thus far, has gone very well. The web site is being improved by the addition of planning letters, area code maps, and downloadable assignment lists. Ron stated that information on CO Codes will be on the web site as NANPA takes over each region. NPAs, CICs, and 900 codes are all there now.

The Council approved the CO Code transition plan. Ron stated that NANPA has developed the mandatory enterprise service of entry of Part 2 data for a fee. NANPA needs pricing approval from the NANC before the service will begin. The Council approved the NANPA required enterprise service and fee schedule.

G. NANPA Working Group Status Report. Karen Mulberry, Co-Chair of the NANPA Working Group, provided the report and handout to the Council. She reviewed the following open action items: (1) pooling administrator requirements; (2) auditing; (3) binder of decisional principles (NANC due date 3/24/98); (4) guidelines for reserving telephone numbers; and (5) guidelines for sharing telephone numbering information between NANPA and the NPAC. Completed items are: (1) Aging of Disconnected Telephone Numbers document; (2) NPA relief requirements and COCUS; and (3) recommendation on DSMT/Toll Free administration neutrality.

Pooling Administrator Requirements. Karen stated that the Working Group had identified three options: (1) an RFP process; (2) the addition of pooling requirements to current NANPA requirements; and (3) direct selection without a competitive bid (single source). Karen reported that the Working Group has requested the Legal Expertise Working Group to provide guidance on the three options.

Binder of Decisional Principles. Karen reported that the Working Group will develop an initial index of appropriate industry guidelines, standards documents, and regulatory orders. The index binder will be maintained by the NANPA.

Guidelines for Reserved Telephone Numbers. Karen stated that this issue will be discussed at the next Working Group meeting. The Working Group is awaiting guidance from

the Legal Expertise Working Group on the definition of reserved numbers. As a boundary for the definition, the Working Group developed the following: "the telephone numbers to which the definition of reserved telephone numbers will apply are those numbers in the 10 digit NANP number format (NPA-NXX-XXXX) within existing geographic Central Office (NXX) Codes and are available for assignment to subscriber access lines or equivalents within a switching entity/POI."

Aging of Disconnected Numbers. It was agreed that at the next meeting, the NANC would discuss the NANPA Working Group document on aging of disconnected numbers and any questions raised with regard to that document.

NPA Relief and COCUS Reporting. Karen reported that the NANPA has agreed to work with industry on COCUS to come up with an appropriate forecasting tool. Chairman Hasselwander noted that the NANC had previously asked the NANPA Working Group and the NANPA what additional information would be necessary to improve COCUS. Ron Conners stated NANPA is aware of the need to do additional work on COCUS and is willing to work with the NANPA Working Group and INC, but that NANPA would not be able to do much until NANPA actually begins CO Code Administration.

The NANPA Working Group recommended that the issue of NPA relief and COCUS reporting be referred to the INC for specific guideline development. Mark Welch commented that there is a need for guidelines for how to provide COCUS information, which would be appropriately worked by the INC. There is also a policy issue regarding how COCUS participation can be enforced. Jo Gallagher stated that the COCUS issues could be introduced at INC, and that NANPA could champion the issue. Bruce Armstrong, NARUC, commented that providers who have NXX codes do not supply the information, and that there is an inherent distrust and unwillingness to supply the information. In his view, the NANC needs to consider what power the NANPA should have to enforce COCUS participation.

Chairman Hasselwander stated a set of guidelines is necessary and that INC is best suited to do that work. Further, he stated, the NANC can accept or reject the guidelines. Paul Hart stated that this will be a continuing process for INC. The industry needs clear guidelines for data gathering and NANC will deal with the enforcement element later, if necessary. The NANPA will be working with the INC on what is necessary. The Council agreed to send the issue to INC by letter to Jo Gallagher, INC Moderator.

DSMI Toll Free Neutrality. Karen stated that the NANPA Working Group reached consensus that DSMI is neutral. There remain broader issues regarding toll free number administration to consider and the Working Group is waiting for feedback from NANC. Glenn Manishin, MCI, stated that MCI disagrees that DSMI meets the neutrality requirements in Section 1.2 of the Requirements Document. The Council accepted the recommendation of the Working Group on DSMI's neutrality. Chairman Hasselwander deferred until a later time the question of whether the NANPA Working Group should work the broader issues associated with toll free administration.

G. *Steering Group Report.* Chairman Hasselwander reviewed the discussion of the February 17, 1998 Steering Group meeting. The main issue discussed was low attendance at Working Group meetings, which has resulted in issues being worked without broad representation. It was agreed that the Working Groups will provide the Steering Group with a prioritized list of all their action items, with objective dates. The Steering Group will create a document outlining responsibilities and due dates in one place for project management.

The Steering Group also discussed how to improve identification of issues that NANC assigns to the working groups. The NANC will not leave an agenda item without clearly noting the action to be taken, if any. This will eliminate time wasted by Working Groups on clarity problems.

The Steering Group agreed that when a new Order from the Commission involves NANC issues, it will be up to the NANC Chairman to bring it to the NANC with a suggested approach for a response. The Chairman will be the gatekeeper of all issues coming into the NANC. Other process items will be dealt with at next Steering Group meeting on March 25. Beginning in June, NANC meetings will be a day and a half.

I. *Other Business.* The Council briefly discussed the consideration of a wireless-only overlay in Connecticut, which may require wireless carriers to give back numbers. It was agreed that, at the April NANC meeting, there will be presentation including both points of view on the Connecticut decision on technology-specific overlays.

Going forward, NANC will take down its decisions reached and action items.

VI. Statement of Action Items and Decisions reached.

1. NANC will send letter to Commission's Common Carrier Bureau informing the Bureau of Southeast, Western and West Coast Region LLCs' change of NPAC vendors, and affirming the LLCs' decisions.
2. LNPA Working Group will provide report at next meeting regarding notification of resolution of question of how to incorporate High-Volume Call-In networks in the LNP scheme.
3. NANC Chairman will write to the LNPA Working Group and direct it to complete work regarding standards and procedures for wireless LNP by May 18, 1998 deadline. The NANC Chairman will write to the Common Carrier Bureau and formally inform the Commission that there is a disparity between wireline to wireless LNP and wireless to wireline LNP, and that work is proceeding for May 18th deadline.
4. NPMG will bring recommendation to next meeting regarding what industry fora should take on certain network-related tasks to support number pooling (ex: SCP and end-office requirements).
5. The NANC approved the CO Code Transition Plan.
6. The NANC approved the NANPA's proposed prices for the mandatory enterprise service of "Part 2 inputs."
7. The NANC will, at its next meeting, examine the questions raised regarding the NANPA Working Group's document on "Aging of Disconnected Numbers."
8. The NANC will refer to INC the project of guideline development for provision of COCUS information to INC.
9. NANC concluded that DSMI is neutral. NANC will vote at next meeting on whether NANPA Working Group will work broader issues pertaining to toll-free number administration.